

Gordon Rees Scully Mansukhani, LLP
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101

ROBERT S. LARSEN, ESQ.
Nevada Bar No. 7785
DIONE C. WRENN, ESQ.
Nevada Bar No. 13285
GORDON REES SCULLY MANSUKHANI, LLP
300 South 4th Street, Suite 1550
Las Vegas, Nevada 89101
Telephone: (702) 577-9300
Facsimile: (702) 255-2858
E-Mail: rlarsen@grsm.com
dwrenn@grsm.com
Attorneys for Defendants,
KRM, Inc, d.b.a Thomas Keller Restaurant Group and
KVP, LP d.b.a. Bouchon Restaurant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FERNANDO HARO III, an individual,)	CASE NO.: 2:20-cv-02113-APG-DJA
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO
vs.)	EXTEND TIME TO FILE
)	REPLIES IN SUPPORT OF
KRM, INC. d.b.a. "THOMAS KELLER)	DEFENDANTS KRM, INC. AND
RESTAURANT GROUP", a foreign corporation;)	KVP, LP'S SPECIAL MOTIONS
and KVP, LP d.b.a. "BOUCHON AT THE)	TO DISMISS
VENETIAN," a foreign Limited Liability)	
Company,)	(First Request)
)	
Defendants.)	
)	

Pursuant to Local Rule IA 7-1, Defendants KRM, Inc, d.b.a Thomas Keller Restaurant Group ("KRM") and KVP, LP d.b.a. Bouchon Restaurant (erroneously named as TK Las Vegas, LLC d.b.a "Bouchon at the Venetian") ("KVP") (collectively, "Defendants"), by and through their attorneys, Robert S. Larsen, Esq. and Dione C. Wrenn, Esq. of the law firm of Gordon Rees Scully Mansukhani LLP, and Plaintiff Fernando Haro III, *in proper person*, hereby stipulate and agree as follows:

1. Plaintiff filed his Complaint on November 16, 2020.
2. Plaintiff filed his First Amended Complaint on February 21, 2021.

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1 3. Pursuant to Court Order [ECF No. 17], Defendant's deadline to file their
2 responses to Plaintiff's First Amended Complaint was June 21, 2021.

3 4. On June 21, 2021, the parties filed a stipulation to extend Defendant's deadline
4 to file their responses to July 2, 2021, which the Court granted. ECF Nos. 18 & 19.

5 5. On June 30, 2021, Plaintiff filed a Second Amended Complaint. ECF No. 22.

6 6. On July 2, 2021, Defendants filed their respective Special Motions to Dismiss
7 Plaintiff's Second Amended Complaint ("Motions"). ECF Nos. 26 & 27.

8 7. Plaintiff's initial deadline to respond to Defendants' Motions was July 19, 2021.

9 8. On July 19, 2021, the parties jointly submitted a stipulation to extend Plaintiff's
10 deadline to file responses to Defendants' Motions to August 27, 2021. ECF No. 30. On July
11 23, 2021, this Court granted the stipulation. ECF No. 31.

12 9. On August 25, 2021, the parties filed a joint stipulation to extend Plaintiff's
13 deadline to file responses to Defendants' Motions to September 17, 2021. ECF No. 32. On
14 August 26, 2021, the Court granted the second request for an extension. ECF No. 33.

15 10. The deadline for Defendants' to file replies in support of their respective
16 Motions was September 27, 2021.

17 11. Due to illness, defense counsel was unable to file on September 27, 2021.

18 12. Counsel for Defendants requests a one (1) week extension to October 4, 2021 to
19 file the replies.

20 13. There are currently no scheduled hearings in this case. Defendants' sought
21 extension will not unduly delay the proceedings.

22 14. Plaintiff does not oppose an extension up to and including October 4, 2021.

23 15. Accordingly, Defendants' shall have until **October 4, 2021**, to file the replies in
24 support of Defendants' Motions.

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26 ///

27 ///

28 ///

1 16. This stipulation is not made for purposes of delay.

2 **IT IS SO STIPULATED.**

3 DATED this 28th day of September 2021.

 DATED this 28th day of September 2021.

4 **GORDON REES SCULLY**
5 **MANSUKHANI**

FERNANDO HARO III

6 /s/ Dione C. Wrenn

/s/ Fernando Haro

7 ROBERT S. LARSEN, ESQ.

 FERNANDO HARO III

8 Nevada Bar No. 7785

 P.O. Box 81972

9 DIONE C. WRENN, ESQ.

 Las Vegas, NV 89180

10 Nevada Bar No. 13285

Plaintiff In Proper Person

11 300 South 4th Street, Suite 1550

12 Las Vegas, Nevada 89101

13 *Attorneys for Defendants*

14 **IT IS SO ORDERED.**

15 
16 UNITED STATES DISTRICT COURT JUDGE

17 DATED: September 28, 2021

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